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Chapter 9 Counsel

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE REGIONAL  
MEDICAL CENTER,

Debtor.

HEALTHCARE CONGLOMERATE  
ASSOCIATES, LLC,

Plaintiff,

v.

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE REGIONAL  
MEDICAL CENTER; DOES 1 through  
20,

Defendants.

CASE NO. 17-13797

Chapter 9

Adv. No.: 17-01095

DC NO.: OHS-1

**STIPULATION TO CONTINUE HEARING  
AND RESPONSE DATE ON MOTION  
FOR REMAND OF LAWSUIT TO STATE  
COURT PURSUANT TO 28 U.S.C. §  
1452(b)**

Date: March 12, 2018

Time: 10:30 a.m.

Place: 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13

Judge: Honorable René Lastreto II

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RECEIVED

February 27, 2018

CLERK, U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
0006228972

Hearing and Response Date re Motion  
to State Court

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00172030-gaa-02.26.2018

1 IT IS HEREBY STIPULATED AND AGREED by and between Healthcare  
2 Conglomerate Associates, LLC and Tulare Local Healthcare District, by counsel, as  
3 follows.

4 1. On December 28, 2017 Tulare Local Healthcare District removed to this  
5 court an action ("Removed Action") that had been filed in the Superior Court for the  
6 County of Los Angeles.

7 2. On January 24, 2018 Healthcare Conglomerate Associates, LLC filed a  
8 Motion for Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b), D.C. No.  
9 OHS-1, which is presently set for hearing on March 12, 2018 at 10:30 a.m.

10 3. On January 29, 2018 Healthcare Conglomerate Associates, LLC filed a  
11 Motion to Dismiss Counterclaim Against HCCA or in the Alternative Strike Portions  
12 Thereof, D.C. No. OHS-2, and Motion to Strike Portions of Answer of Tulare Local  
13 Healthcare District dba Tulare Regional Medical Center, D.C. No. OHS-3, which are  
14 now each set for hearing on April 5, 2018 at 11:00 a.m.

15 4. The parties have discussed these matters and agree that the hearing on  
16 the Motion to Remand of Lawsuit to State Court Pursuant to 28. U.S.C. § 1452(b) will be  
17 continued to April 5, 2018 at 11:00 a.m. Tulare Local Healthcare District's response to  
18 such Motion shall be due on March 22, 2018 and the reply of Healthcare Conglomerate  
19 Associates, LLC shall be due March 29, 2018.

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1           5.     The parties stipulate and agree to entry of a court order approving this  
2 stipulation.

3  
4 IT IS SO STIPULATED.

5 KLEIN, DeNATALE, GOLDNER, ROSENLIB  
6 & KIMBALL LLP; and

7 ORRICK, HERRINGTON & SUTCLIFFE LLP

8 By: 

9 Marc A. Levinson, Attorneys for  
10 Healthcare Conglomerate Associates, LLC

11 WALTER WILHELM LAW GROUP

12 By: 

13 Riley C. Walter, Attorneys for  
14 Tulare Local Healthcare District

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23  
24 Dated: Feb 27, 2018

By the Court

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26 

27 René Lastreto II, Judge  
28 United States Bankruptcy Court